

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

BOBBY MORRIS, individually and on behalf of all others similarly situated,)
Plaintiff,)
v.)
SAFILO AMERICA, INC. D/B/A BLENDRERS EYEWEAR)
Defendant.)
CASE NO. 4:25-CV-00066

**SECOND CONSENT MOTION FOR EXTENSION OF TIME TO
ANSWER OR OTHERWISE RESPOND TO COMPLAINT**

Pursuant to Fed. R. Civ. P. 6(b), and with the consent of Plaintiff, Defendant Safilo America, Inc. (“Safilo”) respectfully moves this Court for an extension of time up to and including April 7, 2025 to answer, move, or otherwise respond to the complaint in this action. In support, Safilo states as follows:

1. On January 16, 2025, Plaintiff filed a Complaint against Safilo in the above-captioned action. Doc. 1.
2. Safilo’s response to the Complaint is currently due March 10, 2025. Doc. 6.
3. Safilo respectfully requests an additional 28 days to answer, move, or otherwise respond to the Complaint. Safilo recently completed its preliminary investigation into Plaintiff’s claims and allegations, and respectfully seeks this additional time so that the parties may discuss Plaintiff’s allegations.
4. Counsel for Safilo corresponded with counsel for Plaintiff on March 3, 2025, and Plaintiff consents to this request.

5. This request is made in good faith and not for purposes of delay, and no party will be prejudiced should this request be granted.

6. This is the second extension of time Safilo has sought in this action.

WHEREFORE, for the foregoing reasons, Safilo respectfully requests that this Court issue an Order granting this consent motion and extending Safilo's time to answer, move, or otherwise respond to the Complaint through and including April 7, 2025.

Dated: March 3, 2025

COZEN O'CONNOR

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*Attorneys for Defendant Safilo American, Inc.
d/b/a Blenders Eyewear*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on March 3, 2025, I caused the foregoing document to be electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing on all parties of record.

s/ Marisa L. Saber

Marisa L. Saber, Esquire